

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO:

**Pending Wave 13 Cases That Are Identified
On Exhibit A**

JOINT SUBMISSION CONCERNING PROPOSED REMAND JURISDICTIONS

Pursuant to Pretrial Order No. 341 § C(1), Plaintiffs and Defendant C. R. Bard, Inc. (“Bard”) hereby jointly provide Exhibit A, which identifies the remand jurisdiction proposed or otherwise agreed to by each Plaintiff in pending Wave 13 cases in MDL 2327. Subject to the reservations below, Bard at this time does not object to the remand jurisdiction proposed by any Plaintiff.

Bard prepared Exhibit A based, in large part, on the proposed remand jurisdiction identified in each Plaintiff’s Short Form Complaint and/or subsequent communications with counsel for certain Plaintiffs. The form and content of Exhibit A was approved by counsel on behalf Plaintiffs’ Leadership. Plaintiffs’ Leadership, however, neither endorses nor rejects the proposed remand jurisdiction in any given case, and the attorneys representing each individual Plaintiff bear sole responsibility for the proposed remand jurisdiction identified in that Plaintiff’s Short Form Complaint.

Bard’s stance towards the venue proposed by Plaintiffs is based on currently-available information that was provided, in large part, by Plaintiffs or their attorneys. Bard thus reserves

the right to object to venue at a later time based on subsequently discovered information concerning a Plaintiff's residence state or implant state, particularly if such information is materially different from the information provided to Bard to date.¹

Dated: November 15, 2019

**BLASINGAME, BURCH, GARRARD
& ASHLEY**

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/s/ Josh Wages

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On Behalf of Plaintiffs' Leadership

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¹ To avoid doubt, this paragraph is submitted solely by and on behalf of Bard.

EXHIBIT A

EXHIBIT A: BARD'S POSITION ON PLAINTIFFS' PROPOSED REMAND JURISDICTIONS IN WAVE 13 CASES

November 15, 2019

PLAINTIFF	CAFN	PLAINTIFF'S LAW FIRM(S)	PLAINTIFF'S STATE OF RESIDENCE	VENUE PROPOSED BY PLAINTIFF OR WHERE CASE WAS FILED	OBJECTION BY BARD	ALTERNATIVE REMAND JURISDICTION PROPOSED BY BARD
Madsen, Veronica	2:16-cv-11633	Tor Hoerman Law, LLC	IL	N.D. Ill., Eastern Div.		
Pizzitola, Tammy	2:13-cv-00249	Dalimonte Rueb Martin Baughman	TX	S.D. Tex., Houston Div.		